

**IN THE UNITED STATE BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In Re: :
Telana Vitara : Chapter 13
Debtor :
: Case No. 1:20-bk-00204
Telana Vitara :
Movant :
:

MOTION TO CONVERT CASE TO CHAPTER 7

AND NOW, the Debtor, Telana Virata, by and through her attorney, Dawn M. Cutaia, of Pugh and Cutaia, LLPC, files this Motion to Convert Case to Chapter 7 and in support thereof states the following:

1. Debtor filed a Chapter 13 bankruptcy on January 21, 2020. Debtor filed the Chapter 13 to catch up on her past due income taxes and mortgage arrears and cram down her vehicle.
2. Once the proofs of claim came in for Debtor's taxes, they were higher than Debtor anticipated and Debtor was struggling to make her Chapter 13 payment; she simply did not have enough income to make the payment. The higher taxes also reduced Debtor's disposable monthly income on Form 122.
3. Debtor decided to surrender the vehicle she was cramming down, obtained permission from the Court to purchase a different vehicle, and believes she can make more affordable payment arrangements to pay her past due taxes outside of bankruptcy.
4. Debtor wishes to convert her case to a Chapter 7, pursuant 11 U.S.C. § 1307 (a).
5. This case has not previously been converted.

WHEREFORE, Debtor respectfully requests this Honorable Court grant this request to convert her case from a Chapter 13 to a Chapter 7.

Date: 12/7/2020

Respectfully Submitted:
/s/ Dawn M. Cutaia
Attorney for Debtor
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ORDER

AND NOW, upon consideration of Debtor's Motion to Convert Case to a Proceeding under Chapter 7 pursuant to 11 U.S.C. § 1307 (a), it is hereby ordered as follows:

That the above-captioned case is converted to a proceeding under Chapter 7.